

EXHIBIT G

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE)
ANTITRUST LITIGATION)
) No. 11-CV-2509-LHK
THIS DOCUMENT RELATES TO:)
ALL ACTIONS.)

DEPOSITION OF: DONNA MORRIS

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

August 21, 2012

Reported by: Anne Torreano, CSR No. 10520

01:39:58 1 were hired at a base salary over the max."

01:40:00 2 Do you see that?

01:40:01 3 A. Yes.

01:40:01 4 Q. Do you know what that's referring to?

01:40:03 5 A. Well, I didn't -- I don't -- I don't know. I
01:40:06 6 can speculate --

01:40:07 7 Q. What -- when it --

01:40:08 8 A. -- but I don't know.

01:40:09 9

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

01:40:25 14 Q. Okay. And then Ms. Swarthout responds, at the

01:40:29 15 e-mail at the top of the second page of this document,

01:40:31 16 "Bernadette, this is interesting. [REDACTED]

[REDACTED]

[REDACTED]

01:40:41 19 this and also check if others are in the right

01:40:43 20 classifications."

01:40:43 21 Do you see that?

01:40:44 22 A. Yes.

01:40:44 23 Q. What's a comp 3 analyst?

01:40:46 24 A. So it is a job level for a compensation
01:40:51 25 analyst.

01:40:52 1 Q. And an analyst 4 is another job level?

01:40:54 2 A. That's right.

01:40:55 3 Q. And each of those job levels respectively have
01:40:57 4 their own salary ranges, is that right, associated with
01:41:00 5 them?

01:41:00 6 A. Correct.

01:41:01 7 Q. Okay. And part of what was being studied here
01:41:04 8 was whether or not individuals who had particular job
01:41:08 9 categories had salaries that fell within the min/max
01:41:14 10 ranges for those categories?

01:41:15 11 A. I don't know what sparked Ellen's desire to
01:41:18 12 have this data. All I know is the e-mail that she sent
01:41:22 13 to me asking about the process.

01:41:25 14 Q. Okay. But the question was, there was a study
01:41:29 15 done to see -- at some point in 2004, to see whether or
01:41:33 16 not people remember being compensated within the min
01:41:37 17 and max ranges for particular job categories; correct?

01:41:41 18 A. It looks like what she requested were people
01:41:43 19 who were over the maximum of the range.

01:41:45 20 Q. Right. [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

01:41:53 23 MR. KIERNAN: Objection with respect to
01:41:55 24 completion. Lacks foundation.

01:42:01 25 MR. CRAMER: Okay.

01:42:01 1 MR. KIERNAN: Misstates the document.

01:42:03 2 BY MR. CRAMER:

01:42:03 3 Q. [REDACTED]

[REDACTED] [REDACTED]

01:42:10 5 Right?

01:42:10 6 A. Yes.

01:42:10 7 Q. And so what did -- I'm just trying to

01:42:13 8 understand, from an HR perspective, that means that of

01:42:16 9 the [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

01:42:26 12 A. It appears to be so, yes.

01:42:28 13 Q. Okay. And then if you turn to the first page,

01:42:31 14 Ms. Arriada is reporting back to Ms. Swarthout that it

01:42:38 15 turns out that a couple were on that list in error; is

01:42:41 16 that right?

01:42:42 17 A. It appears to be that.

01:42:43 18 Q. Right. And that they had the wrong job

01:42:46 19 category in the software; is that right?

01:42:48 20 A. That appears what she's indicated, yes.

01:42:50 21 Q. Okay. It says, "The field that the report was

01:42:53 22 pulling from was showing the job that happened to be

01:42:55 23 over the salary range, when in fact the real job was

01:42:59 24 not over the max."

01:43:00 25 Right?

01:43:00 1 A. Mm-hmm.

01:43:01 2 Q. Okay. So in fact, there were fewer than

01:43:06 3 [REDACTED] during this period the study found that were hired

01:43:09 4 over the max for their category; is that right?

01:43:13 5 Yes?

01:43:13 6 A. Right.

01:43:13 7 Q. Okay. And then -- so you were -- your --

01:43:19 8 Ms. Swarthout forwards this to you.

01:43:22 9 Do you know why she forwarded it to you?

01:43:23 10 A. My role of global talent, I suppose she
01:43:27 11 assumed that I knew all of the [REDACTED] people that were
01:43:32 12 hired and exactly what job code that they should be in,
01:43:35 13 which would be pretty difficult for someone to know --

01:43:39 14 Q. Sure.

01:43:40 15 A. -- all [REDACTED]
[REDACTED]

01:43:45 17 Q. Right.

01:43:45 18 So she says to you, "Did you know of all of
01:43:48 19 these that were hired over the max? We should discuss
01:43:51 20 the process that escalates these types of hires since
01:43:53 21 it begs a few questions, i.e., is the job priced
01:43:57 22 correctly, leveled correctly?"

01:43:58 23 Do you see that?

01:43:58 24 A. Mm-hmm.

01:43:59 25 Q. Do you know what she meant by "is the job

REPORTER'S CERTIFICATE

I, Anne Torreano, Certified Shorthand Reporter licensed in the State of California, License No. 10520, hereby certify that the deponent was by me first duly sworn, and the foregoing testimony was reported by me and was thereafter transcribed with computer-aided transcription; that the foregoing is a full, complete, and true record of said proceedings.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing proceeding and caption named or in any way interested in the outcome of the cause in said caption.

The dismantling, unsealing, or unbinding of the original transcript will render the reporter's certificates null and void.

In witness whereof, I have subscribed my name this 31st day of August, 2012.

☒ Reading and Signing was requested.

☐ Reading and Signing was waived.

☐ Reading and Signing was not requested.

ANNE M. TORREANO, CSR No. 10520